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June 1, 1993

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Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: PR Docket No. 92-257, RM-7956, RM-8031

Dear Ms. Searcy:

Transmitted herewith, on behalf of Alascom, Inc., are an original and nine copies of its Comments in the above-referenced proceeding.

In the event there are any questions concerning this matter, please communicate with this office.

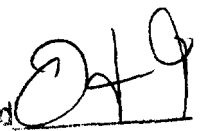
Very truly yours



Charles R. Naftalin

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nearby backbone microwave repeater where they are then fed into a common circuit back to a pump station and alarm center.

Because of this "party line" arrangement, nearby transmissions by other users of these frequencies could interfere with the transmission of alarms from, or control signals to, other blocking valves. This could produce intolerable interference and undue delay in activating a blocking valve.

It is imperative that any variations in oil flow be reported immediately to a pump station or alarm center. With the high temperatures and pressure of the flowing oil, even a small crack in the pipeline could result in a massive oil spill and cause permanent damage to the delicate ecological balance of the tundra or fish spawning streams. That damage could have a serious, or even disastrous, effect on the environment, including the migration of caribou herds, which are depended upon for subsistence by natives populating small villages scattered throughout Central Alaska.


Activation of a blocking valve must be through a series of commands so that it closes in stages, preventing backlash and further damage or rupture to the pipeline. Any random transmissions from other radios on the "party line" could disrupt the control of a blocking valve and potentially exacerbate an oil spill.

In the interests of health, safety and environmental protection, Alascom brings its existing waivers for these VHF frequencies to the Commission's attention, and urges that they be

continued permanently by any action in this proceeding. Such continuation would be a reasonable and prudent safety precaution which would not unfairly burden other VHF frequency users because of the special circumstances of the Trans-Alaska pipeline and its extremely remote location.

Respectfully submitted,

ALASCOM, INC.


By /s/ Charles R. Naftalin
Charles R. Naftalin

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Its Attorney

June 1, 1993